



Air Pollution Control Board
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R. J. Sommerville

COMPLIANCE ADVISORY

Amendments to Rule 67.18 Marine Coating Operations

On December 13, 1994, the Air Pollution Control District adopted amendments to Rule 67.18, an existing rule that regulates emissions of volatile organic compounds (VOC's) resulting from coating (painting) marine vessels and other structures exposed to a marine environment.

The purpose of the amendments were to correct deficiencies identified by the Environmental Protection Agency (EPA), meet the requirements of the Federal and California Clean Air Acts and make other changes requested by local industry.

The amended rule includes the following:

Applicability Subjects fresh water vessels to Rule 67.18 requirements.

Exempts marine coating operations which are subject to Rule 67.18 from the requirements of District Rule 66.

Exemptions Clarifies existing exemptions.

Adds an exemption for polyester resin operations subject to Rule 67.12.

Adds an exemption for non commercial marine coating operations performed by individuals at their personal residence for the purpose of coating their own pleasure craft(s).

Adds an exemption for marine coatings used in volumes of less than 20 gallons per year at permitted stationary sources.

Adds an exemption for solvent cleaning equipment subject to Rule 67.6 and used for surface preparation.

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Definitions Adds, deletes or amends certain definitions for clarification.

VOC Limits Provides new specialty coating categories and revises the VOC limits for several existing specialty coatings as listed below:

<u>CATEGORY</u>	<u>VOC LIMIT*</u> <u>Effective 12/13/94</u>
Antenna Coating	340
Antifoulant Coating (for pleasure craft)	400 (Drops to 330 effective 6/13/95)
Finish Primer	600
High Solids Epoxy Coating	280
Pleasure Craft Topcoat	650
Preconstruction Zinc Primer	650
Radar Exterior Topcoat	340
Thermoplastic Coatings used in a Repair and Maintenance Operation	550

*(VOC limits are expressed as grams of VOC per liter of coating, as applied, excluding water and exempt compounds.)

Surface Preparation and Cleaning Adds an option for using materials with low VOC content, high boiling point or low vapor pressure for surface preparation and cleaning operations. Adds additional optional methods for equipment cleaning operations.

Control Equipment Clarifies the requirements for add-on control equipment.

Alternative Emission Control Plan Allows for rule compliance by using an approved Alternative Emission Control Plan (AECPP) pursuant to Rule 67.1.

Recordkeeping Requirements Clarifies recordkeeping requirements and provides an option for keeping monthly usage records of VOC containing materials.

Test Methods Updates test methods for determining compliance with the rule.

A copy of Rule 67.18 is enclosed. For more information, please call the District's Compliance Division at (619) 694-3340.

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